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March 10, 2021

SENT VIA ECF

Honorable Analisa Torres
U.S. Southern District of NY
500 Pearl Street
New York, NY 10007

Re: USA v Michael Thomas, et al.
Docket No.: 1:19-cr-00830
Request for Emergency Out of State Travel

Your Honor,

This firm represents Defendant, Michael Thomas, in the above-captioned matter. We are seeking the courts permission for Michael Thomas to take an emergency trip to the State of Georgia to tend to his sick father.

Kristen McKeown, his pre-trial services officer, does not oppose his emergency travel.

Respectfully yours

/s/ Montell Figgins
Montell Figgins, Esq.
Attorney for Defendant Michael Thomas

cc: Nicolas Roos, Esq., *Counsel for Plaintiff*
Rebekah Donaleski, Esq., *Counsel for Plaintiff*
Jessica Lonergan, Esq., *Counsel for Plaintiff*
Jason Erroy Foy, Esq., *Counsel for Defendant Noel*